

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	DECLARATION OF JASON A. FORGE IN
CORRECTIONS CORPORATION OF )	SUPPORT OF PLAINTIFF'S OPPOSITION
AMERICA, et al., )	TO DEFENDANTS' MOTION TO
Defendants. )	EXCLUDE TESTIMONY OF DONNA
_____ )	MELLENDICK

**[FILED UNDER SEAL]**

I, JASON A. FORGE, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted *pro hac vice* before this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund in the above-captioned action. This Declaration is made in support of Plaintiff's Opposition to Defendants' Motion to Exclude Testimony of Donna Mellendick. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit A: Deposition transcript of D. Scott Dodrill, dated October 15, 2020 **[FILED UNDER SEAL]**;
- Exhibit B: Deposition transcript of Harley G. Lappin, dated October 29, 2020 **[FILED UNDER SEAL]**;
- Exhibit C: Email from Damon Hininger to David Garfinkle, dated July 17, 2016 (Bates No. CORECIVIC\_0114917-CORECIVIC\_0114918) **[FILED UNDER SEAL]**;
- Exhibit D: Deposition transcript of Harley G. Lappin, dated July 28, 2020 **[FILED UNDER SEAL]**; and

Exhibit E: Email from Damon Hininger to David Garfinkle *et al.*, dated January 22, 2015 (Bates No. CORECIVIC\_0036536-CORECIVIC\_0036538) [**FILED UNDER SEAL**].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22nd day of January, 2021, at San Diego, California.

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s/ Jason A. Forge  
JASON A. FORGE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on January 22, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Jason A. Forge

JASON A. FORGE

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